

THE LAW OFFICE OF

ELISA HYMAN, P.C.

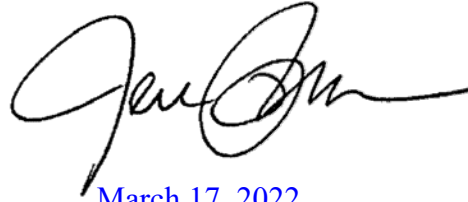
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March 16, 2022

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 124. SO ORDERED.

VIA ECF

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007



March 17, 2022

Re: *N.J. and G.J. v. N.Y.C. Dep't of Educ., et al.*  
18-cv-06173 (JMF)

Dear Judge Furman:

I represent the Plaintiffs in this action and am writing jointly with Defendants to provide (a) an update on the status of settlement pursuant to Your Honor's Order; (b) jointly request an extension of time to file the motions for reconsideration and motion to certify for interlocutory appeal; and (c) continue the stay of discovery. We request a *nunc pro tunc* extension of one day for this letter. We apologize for the joint calendaring error.

The parties and their counsel have continued to participate in settlement discussions under the supervision of Magistrate Judge Moses. We have another two-hour conference on April 25, 2022 with the Court.

Since we last wrote to the Court, we have made progress, but we are still quite far apart on the financial issue we previously shared with the Court. We advised Judge Moses that we would continue to negotiate in the time prior to the conference. Plaintiffs made a counter-offer on March 5, 2022, and are waiting for a response from Defendants. The parties will endeavor formally respond to all future offers and counters within one week or less.

We continue to feel cautiously optimistic that with Judge Moses's assistance, we can work to close the gap.

Therefore, as we are still engaged in active negotiations, we respectfully propose that the Court again extend the time to file motions for reconsideration and that the Court continue the stay of discovery. The parties further respectfully propose to provide another status update to the Court by April 30, 2022. Moreover, Plaintiffs request that the deadline for motions expire two weeks after the next status conference, rather than on the date of the conference, as Plaintiffs would need time to prepare the motions in the event that the settlement process is unsuccessful.

Respectfully Submitted,

*/s/ Elisa Hyman*

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Elisa Hyman, Esq.  
Counsel for Plaintiffs

cc: Andrew Rauchberg, Esq., Counsel for Defendants